

John K. Gallagher (Nevada Bar No. 00956)
 GUILD, RUSSELL, GALLAGHER & FULLER, LTD.
 100 West Liberty Street, Suite 800
 Reno, Nevada 89501
 Telephone: (775) 786-2366
 Facsimile: (775) 322-9105
jgallagher@grgflaw.com

Robert G. Krupka, P.C.
 Marc H. Cohen
 Brian G. Arnold
 Lindsay D. Casamassima
 Richard T. Jackson
 KIRKLAND & ELLIS LLP
 777 South Figueroa Street
 Los Angeles, California 90017
 Telephone: (213) 680-8400
 Facsimile: (213) 680-8500

Attorneys for Defendant, Counterclaim Plaintiff and Third-Party
 Plaintiff IGT

UNITED STATES DISTRICT COURT
 DISTRICT OF NEVADA

BALLY GAMING, INC., a Nevada corporation)
 d/b/a BALLY TECHNOLOGIES,)

Plaintiff and Counterclaim Defendant,)

vs.)

IGT, a Nevada corporation,)

Defendant and Counterclaim Plaintiff.)

IGT, a Nevada corporation,)

Third-Party Plaintiff,)

vs.)

SIERRA DESIGN GROUP, a Nevada)
 corporation,)

Third-Party Defendant.)

CASE NO. 3:06-CV-00483-ECR-(RAM)

**REQUEST TO FILE DOCUMENTS
 UNDER SEAL AND ORDER**

REQUEST TO FILE UNDER SEAL

Defendant, Counterclaim Plaintiff and Third-Party Plaintiff IGT (“IGT”) respectfully requests that the Court allow IGT to file under seal the following documents:

- IGT’s Opposition to Bally’s Emergency Motion to Strike New Material from IGT’s Reply in Support of IGT’s Amended Motion for Summary Judgment; and
- Confidential Declaration of Lindsay D. Casamassima in Support of IGT’s Opposition to Bally’s Emergency Motion to Strike New Material from IGT’s Reply in Support of IGT’s Amended Motion for Summary Judgment, and attached exhibits.

The Stipulated Protective Order Regarding Confidential and Privileged Information provides that, “To the extent that any Confidential or Highly Confidential Information is contained in, incorporated in, reflected in, described in, or attached to any document submitted to the Court, counsel shall file that submission under seal.” (See Docket No. 54 at ¶ 12.) The Order defines “Confidential” material as any information that the designating party has a good faith belief to be non-public. “Highly Confidential” material is any information that the designating party has a good faith belief to be proprietary information, trade secrets, or other highly sensitive commercial or competitive information. (See *id.* at ¶¶ 3-4.)

1 For the foregoing reasons, IGT respectfully requests the Court to order that the
2 aforementioned documents, along with all exhibits, shall be maintained under seal.

3 DATED: March 3, 2008

KIRKLAND & ELLIS LLP

4
5 By: /s/ Lindsay D. Casamassima

6 Robert G. Krupka, P.C.
7 Marc H. Cohen
8 Brian G. Arnold
9 Lindsay D. Casamassima
10 Richard T. Jackson
11 KIRKLAND & ELLIS LLP
12 777 S. Figueroa Street
13 Los Angeles, California 90017
14 Telephone: (213) 680-8400
15 Facsimile: (213) 680-8500

16 John K. Gallagher (Nevada Bar No. 00956)
17 GUILD, RUSSELL, GALLAGHER & FULLER, LTD.
18 100 West Liberty Street, Suite 800
19 Reno, Nevada 89501
20 Telephone: (775) 786-2366
21 Facsimile: (775) 322-9105
22 jgallagher@grgflaw.com

23 Attorneys for Defendant, Counterclaim Plaintiff and
24 Third-Party Plaintiff IGT, a Nevada corporation

25 IT IS SO ORDERED

26 Dated: March 4 _____, 2008

27
28 

Hon. Robert A. McQuaid, Jr.
United States Magistrate Judge

Certificate Of Service

The undersigned hereby certifies that the foregoing document entitled **REQUEST TO FILE DOCUMENTS UNDER SEAL AND [PROPOSED] ORDER**, was filed electronically in compliance with Local Rule 5-3. As such, this notice was served on all counsel who have consented to electronic service pursuant to Local Rule 5-4. Pursuant to Fed. R. Civ. P. 5 (b)(2)(A) and Local Rule 5-4, all other counsel of record not deemed to have consented to electronic service were served with a true and correct copy of the foregoing by First Class U.S. Mail on March 3, 2008.

/s/ Lindsay D. Casamassima
Lindsay D. Casamassima